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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Pride Funding, LLC (f/k/a Pride Group,
LLC)

Plaintiff,

vs.

Cranford Harrison Developers LLC;
Alex Pavlovsky; and any Unknown
Tenants or Occupants.

Defendants.

**Notice of Removal
Under 28 U.S.C. § 1441(a)
(Diversity of Jurisdiction)**

To the Clerk of the Court, with Notice to:

Kevin M. Capuzzi, Esq.
Noelle B. Torrice, Esq.
Benesch, Friedlander, Coplan & Aronoff LLP
411 Hackensack Avenue, 3rd Floor
Hackensack, NJ 07601-6323

Please take notice that Cranford Harrison Developers LLC. (hereinafter, “the LLC”) and Alexander Pavlovsky hereby submit this Petition for Removal in accordance with 28 U.S.C. § 1446. Defendants would show as follows:

1. This case was commenced in the Superior Court of New Jersey, Chancery Division, Union County, under Docket No. F-11914-22. A copy of the complaint is attached hereto as Exhibit A.

2. The nature of the action is to foreclose a mortgage upon and obtain possession of real property located at 24 South Avenue W, Cranford Twp. (Union County), New Jersey.

3. Other than the filing of the Complaint, the only further proceedings before the Superior Court of New Jersey has been the filing of a lis pendens notice (Exhibit B hereto) and a corrected lis pendens notice (Exhibit C hereto). A printout of the Superior Court's online docket sheet is attached hereto as Exhibit D.

4. The Complaint alleges that the principal balance owed on the debt being foreclosed upon is \$1,270,000,000. The value of the real property subject to foreclosure exceeds this amount. Thus, the amount in controversy in this action exceeds this Court's jurisdictional minimum of \$75,000.

5. On information and belief, and as alleged in the Complaint, Plaintiff is a citizen of the State of New York.

6. Defendant Alexander Pavlovsky is a citizen of the State of Florida.

7. The LLC is a citizen of the State of Florida.

8. Based on the above, there is complete diversity of citizenship between the parties.

9. None of the defendants is a resident or citizen of the forum State, New Jersey.

10. This Court had original jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a)(1).

11. Neither Defendant has been served with process in this lawsuit. Defendants first learned of the existence of this lawsuit on November 22, 2022. This Petition for Removal is being filed within 30 days thereafter.

12. If any question arises as to the propriety of this Notice of Removal, Defendants respectfully request an opportunity to supplement the record, present a brief, and/or participate in oral argument on any Motion to Remand.

13. This action is subject to removal to this Court pursuant to 28 U.S.C. § 1441(b).

WHEREFORE, Defendants Cranford Harrison Developers LLC and Alexander Pavolvsky hereby request that this action be removed from the Superior Court of New Jersey, Chancery Division, Union County, to the United States District Court for the District of New Jersey, Newark Vicinage.

Respectfully Submitted,

Brookner Law Offices, LLC
Attorneys for Defendants Cranford
Harrison Developers LLC and
Alexander Pavolvsky

By: /s/ Jeffrey Brookner
Jeffrey J. Brookner, Esq.